

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DANA HAMBERGER
A/K/A DAN HAMBERGER,

DEBTOR

Chapter 13

1:16-bk-02478-MDF

OBJECTION

OBJECTION TO MOTION TO DISMISS

1. Debtor filed an emergency Chapter 13 Bankruptcy Petition on June 13, 2016 after unsuccessfully trying to work out a loan modification.
2. Debtor's amended plan is overdue.
3. Counsel needs additional time to review Debtor's plan and case with him as there is an issue with his car payments and post-petition arrears may need to be rolled into his amended plan.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Trustee's Motion to Dismiss.

Date: 1/19/2017

Respectfully Submitted:
/s/ Dawn M. Cutaia

Supreme Court ID 77965
Attorney for Debtor